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6 UNITED STATES DISTRICT COURT  
7 NORTHERN DISTRICT OF CALIFORNIA

8 -000-

9 UNITED STATES OF AMERICA,  
10

11 Plaintiff,

12 vs.

13 SHANNON BLAYLOCK, et al.,

14 Defendant

) No. CR 07-0454 PJH  
)  
)  
)

) **DEFENDANT SHANNON BLAYLOCK'S**  
) **ADDITIONAL QUESTIONS FOR COURT'S**  
) **GENERAL VOIR DIRE OF THE JURY**  
)  
)

) Trial Date: September 15, 2008  
) Pretrial Conference: August 27, 2008  
) Hearing Time: 1:30 p.m.

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19 COMES NOW defendant Shannon Blaylock pursuant to Rule 24(a) of the Federal Rules of  
20 Criminal Procedure, that the Court include the attached questions in its general voir dire of the jurors  
21 prior to the requested attorney conducted voir dire in order that the defense may effectively exercise  
22 its challenges for cause and peremptory challenges. The court has an affirmative duty to pose

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uestions which will elicit information above and beyond the level required to disqualify a juror for  
cause. See U.S. v. Washington, 819 F.2d 221, 224 (9<sup>th</sup> Cir. 1987).

DATED: August 13, 2008

Respectfully submitted,

By /s/ Michael Stepanian  
Michael Stepanian  
Attorney for Defendant  
Shannon Blaylock

1. Defendant Shannon Blaylock is charged with sex trafficking of a child and conspiracy to engage in sex trafficking of a child. Is there anything about the nature of these charges that would make it difficult for you to be fair and impartial as a judge of the facts?
2. Defendant Shannon Blaylock has engaged in sex trafficking of adult women. He is not charged with a crime for engaging in this conduct. Can you set aside any bias or prejudice you may have against him because he engaged in sex trafficking of adult women?
3. In order for the Government to meet its burden of proving defendant's guilt beyond a reasonable doubt, the Government must prove the defendant had actual knowledge of the age of a female identified as "V.S." and not simply that he should have known. Is there anything about Shannon Blaylock's background that you have heard that would prevent you from being impartial in deciding whether the Government met its burden of proof?

DATED: August 13, 2008

Respectfully submitted,

By /s/ Michael Stepanian  
Michael Stepanian  
Attorney for Defendant  
Shannon Blaylock